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24          Attorneys for Plaintiffs

25           **UNITED STATES DISTRICT COURT**  
26           **NORTHERN DISTRICT OF CALIFORNIA**

27          CHASOM BROWN, WILLIAM BYATT,  
28          JEREMY DAVIS, CHRISTOPHER  
29          CASTILLO, and MONIQUE TRUJILLO  
30          individually and on behalf of all other  
31          similarly situated,

32           Plaintiffs,

33          vs.

34          GOOGLE LLC,

35           Defendant.

36          William Christopher Carmody  
37          (admitted *pro hac vice*)  
38          Shawn J. Rabin (admitted *pro hac vice*)  
39          Steven M. Shepard (admitted *pro hac vice*)  
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60          Case No.: 5:20-cv-03664-LHK

61           **DECLARATION OF ALEXANDER**  
62           **FRAWLEY IN OPPOSITION TO**  
63           **GOOGLE'S MOTION TO DISMISS**  
64           **COUNTS SIX AND SEVEN OF**  
65           **PLAINTIFFS' SECOND AMENDED**  
66           **COMPLAINT**

67          The Honorable Lucy H. Koh  
68          Courtroom 8 – 4th Floor  
69          Date: September 30, 2021  
70          Time: 1:30 p.m.

## **DECLARATION OF ALEXANDER FRAWLEY**

I, Alexander Frawley, declare as follows.

3           1. I am an associate with the law firm of Susman Godfrey L.L.P., counsel for Plaintiffs in  
4 this matter. I am an attorney at law duly licensed to practice before all courts of the State of New  
5 York and admitted *pro hac vice* in this case (Dkt. No. 97). I have personal knowledge of the  
6 matters set forth herein and am competent to testify.

7           2. Attached hereto as **Exhibit A** is a true and correct copy of the Google Chrome Privacy  
8 Notice in effect since January 15, 2021, which I last accessed on June 14, 2021, on the publicly  
9 available website <https://www.google.com/chrome/privacy/>.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 15th day of June, 2021, at New York, New York.

/s/ *Alexander P. Frawley*